

# **EXHIBIT W**

1           A.     Because it's an important issue that she was  
2 bringing, and she needed to be aware of what plan she  
3 was following, or section.

4           Q.     And what kind of things would she need to know  
5 about in those plans and sections?

6           A.     She would need to be advised of her rights  
7 under the EDR plan.

8           Q.     And what kind of rights do those include?

9           A.     The rights that are covered in the plan. I do  
10 not have it memorized.

11          Q.     That's okay. Are you familiar with the  
12 district's shared services agreement?

13          A.     Which district? What agencies are you  
14 referring to?

15          Q.     I believe that the Western District, the  
16 Federal Defender's Office for the Western District of  
17 North Carolina, is under a shared services agreement  
18 with other entities. Are you familiar with that?

19          A.     I am not familiar with that.

20          Q.     Do you perform any human resources function  
21 for the Federal Defender's Office in the Western  
22 District?

23          A.     Not officially, no.

24          Q.     Unofficially?

25          A.     I have unofficially given advice and helped

1 with personnel stuff.

2 Q. What were those matters?

3 A. I have printed facility access cards when new  
4 Federal Defender staff are hired on board. I do not  
5 process any transactions. I don't have access. I  
6 answer questions that are related to benefits, any and  
7 all benefits.

8 Q. And you said you've given advice.

9 A. On the benefits.

10 Q. On the benefits. Any other kinds of advice  
11 that you've ever given?

12 A. Not that I recall.

13 Q. And in August of 2018 were you working within  
14 the probation office?

15 A. Yes.

16 Q. And what was your role?

17 A. Human resources manager, and I'm also shared  
18 with the District Court.

19 Q. And do you know if that's pursuant to the  
20 shared services agreement?

21 A. Of which agency?

22 Q. Of these multiple entities who share certain  
23 functions, including HR services.

24 A. The Federal Defenders were not included in my  
25 MOE for shared services.